

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA

In re WIRECARD AG SECURITIES  
LITIGATION

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This Document Relates To:

ALL ACTIONS.

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) Civ. Action No. 2:20-cv-03326-AB

) CLASS ACTION

) LEAD PLAINTIFFS' MOTION TO  
) PARTIALLY LIFT THE PSLRA  
) DISCOVERY STAY  
)

Lead Plaintiffs Thanh Sam and Lawrence Gallagher (“Plaintiffs”) hereby move the Court for an order partially lifting the Private Securities Litigation Reform Act of 1995’s (“PSLRA”) mandatory discovery stay so that Plaintiffs may secure document discovery from Defendant Wirecard AG’s wholly owned subsidiary, Wirecard North America, Inc., which was very recently sold to another company. In support of this Motion, Plaintiffs submit herewith a Memorandum of Law and Declaration of John H. George, dated November 6, 2020.

DATED: November 6, 2020

SAXTON & STUMP  
LAWRENCE F. STENGEL (P.A. Bar # 32809)

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on November 6, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

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